

EXHIBIT D



DECLARATION OF DUANE L. BURNHAM

I, Duane L. Burnham, make the following statements based upon my own personal knowledge:

1. My name is Duane L. Burnham. I served as the Chief Executive Officer of Abbott Laboratories ("Abbott") from 1990 to December 1998, and as Chairman of the Board of Directors of Abbott from 1990 until my retirement in April 1999.
2. I have been advised that the Plaintiffs in this lawsuit claim that they require my deposition in order to discover information about certain lobbying efforts they suggest I participated in relating to the 1997 Balanced Budget Act; my participation in an organization known as the Healthcare Alliance or the Healthcare Leadership Council; and the marketing, pricing, and sale of Abbott's pharmaceutical products.
3. I do not recall participating in any lobbying efforts relating to the 1997 Balanced Budget Act. Nor do I recall ever participating in any lobbying efforts relating to any proposed legislation concerning the reimbursement of pharmaceutical products under the Medicare or Medicaid programs.
4. I do not recall any knowledge of any organization known as the Healthcare Alliance, nor of any involvement with any such organization.
5. During my tenure as CEO of Abbott, I was involved for some time with the Healthcare Leadership Council ("HLC"), a group that brings together senior executives from many different companies and organizations in the healthcare field to discuss healthcare-related issues. I do not recall participating in any discussion or other activity with the HLC that was related to pharmaceutical pricing or the reimbursement of pharmaceutical products under the Medicare or Medicaid programs.


6. In my capacity as Abbott's CEO, I was not responsible for the day-to-day oversight of matters such as the pricing, marketing and sale of Abbott's products around the world. Other persons at Abbott had these day-to-day responsibilities, and they advised me as necessary. Even while I was the CEO of Abbott, therefore, I did not have unique or superior personal knowledge within the company about such matters. Since my retirement from Abbott nearly a decade ago, I have not been involved in any way with the marketing, pricing, or sale of Abbott products.

7. Although I am retired from Abbott, I continue to be active in the business community, including serving as a Trustee for the National Trust for Historic Preservation and a Life Trustee for Northwestern University.

8. It would impose a substantial burden upon me if I were forced to give a deposition in this matter, particularly given the fact that I have no unique or superior knowledge of any matters relating to this litigation.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 5, 2007.


Duane L. Burnham